

Caption in Compliance with D.N.J. LBR 9004-1(b)  
2016-0829

Powers Kirn, LLC  
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Moorestown, NJ 08057  
856-802-1000

In Re:

JoAnne M. Jacuk



Order Filed on November 9,  
2016 by Clerk U.S. Bankruptcy  
Court District of New Jersey

Case No.: 16-17561-JNP

Hearing Date: 10/05/2016

Judge: Honorable Jerrold N. Poslusny, Jr.

Chapter: 13

CONSENT ORDER PROVIDING FOR SURRENDER OF REAL ESTATE,  
VACATING STAY AND ALLOWING PROSPECTIVE IN REM RELIEF

The relief set forth on the following pages, numbered two (2) through two (2) is  
hereby **ORDERED**.

DATED: November 9, 2016

  
Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

Debtor: JoAnne M. Jacuk

Case No.: 16-17561-JNP

Caption of Order: CONSENT ORDER PROVIDING FOR SURRENDER OF REAL ESTATE,  
VACATING STAY AND ALLOWING PROSPECTIVE IN REM RELIEF

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Upon the application of Powers Kim, LLC, attorneys for Bank of America, N.A., debtor(s)' mortgagee, for an order surrendering real property to the secured creditor and allowing relief from the automatic stay and in-rem prospective relief, and it appearing that the parties consent hereto and for cause shown, it is

**ORDERED** as follows:

1. The real property know as 7704 Aspen Street, Hamilton Township, New Jersey, 08330 is hereby surrendered to the secured creditor, Bank of America, N.A., and the automatic stay is hereby vacated to permit the secured creditor to institute or resume and prosecute to conclusion one or more actions in the court(s) of appropriate jurisdiction to pursue rights in the subject property.
2. The secured creditor, Bank of America, N.A., its successors or assigns, are hereby granted in-rem prospective relief from the automatic stay authorizing said party to proceed against the premises 7704 Aspen Street, Hamilton Township, New Jersey, 08330 without regard for any future bankruptcy filing by the debtor without obtaining further order of this court.
3. That the secured creditor and its successors or assigns may join the debtor and any trustee appointed in this case as defendants in actions(s) irrespective of any conversion to any other chapter of the Bankruptcy Code.
4. The secured creditor shall serve this order on the debtor, debtor's counsel and the Standing Chapter 13 Trustee.

The undersigned hereby consent to the form and entry of the foregoing order.

/s/ Daniel L. Reinganum  
Daniel L. Reinganum, Esquire  
Attorney for JoAnne M. Jacuk

/s/ William M. E. Powers III  
William M. E. Powers III  
Attorney for Bank of America, N.A.

**Certificate of Notice Page 3 of 3**  
United States Bankruptcy Court  
District of New Jersey

In re:  
JoAnne M. Jacuk  
Debtor

Case No. 16-17561-JNP  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-1

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Nov 09, 2016

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 11, 2016.

db +JoAnne M. Jacuk, 7 Windgate Rd., Cherry Hill, NJ 08003-1822

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Nov 11, 2016

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 9, 2016 at the address(es) listed below:

Adam D. Greenberg on behalf of Creditor PFS Financial 1, LLC agreenberg@hgllclaw.com,  
Aholmes@hgllclaw.com  
Daniel L Reinganum on behalf of Debtor JoAnne M. Jacuk dreinganum@MPADLaw.com,  
kgresh@mpadlaw.com;djamison@mpadlaw.com;jhughes@mpadlaw.com  
Isabel C. Balboa ecfmil@standingtrustee.com, summarymail@standingtrustee.com  
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmil@standingtrustee.com,  
summarymail@standingtrustee.com  
Joshua I. Goldman on behalf of Creditor PNC Bank, National Association  
jgoldman@kmlawgroup.com, bkgroup@kmlawgroup.com  
Michael E. Blaine on behalf of Creditor TD Bank, N.A. successor in interest to Commerce Bank,  
NA mblaine@schillerknapp.com,  
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William M.E. Powers on behalf of Creditor Bank of America, N.A. ecf@powerskirn.com  
William M.E. Powers, III on behalf of Creditor Bank of America, N.A. ecf@powerskirn.com  
TOTAL: 8